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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Part 90) PR Docket No. 92-209
of the Commission's Rules)
to Expand Coordination) RM-7965
of the 800 MHz)
General Category Channels)

To: The Commission

COMMENTS
OF THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.

The Industrial Telecommunications Association, Inc. ("ITA"), pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. 1.415, hereby respectfully submits these Comments in the above-referenced proceeding.¹

I. PRELIMINARY STATEMENT

1. The Industrial Telecommunications Association, formerly the Special Industrial Radio Service Association, Inc., is a non-profit association organized under the laws of the District of Columbia. ITA is the Commission's certified frequency coordinator for the Special Industrial Radio Service and the Industrial/Land

¹ The Notice of Proposed Rule Making in this proceeding was adopted on September 9, 1992. The comment date is November 27, 1992; reply comments are due to be filed on or before December 14, 1992.

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Transportation 800/900 MHz frequency "pools." ITA also coordinates channels from the general access pool for those entities (a) eligible to become Industrial/Land Transportation licensees, (b) wishing to expand trunked systems, or (c) consolidating conventional systems into a trunked system. ITA coordinates in excess of 6,000 applications per year on behalf of applicants seeking Commission authority to operate radio stations on frequency assignments allocated to the Special Industrial Radio Service and the enumerated 800/900 MHz frequency "pools."

2. ITA enjoys the support of a membership that includes more than 9,000 licensed two-way land mobile radio communications users and the following trade associations:

- Alliance of Motion Picture and Television Producers
- American Mining Congress
- Associated Builders & Contractors, Inc.
- Florida Citrus Processors Association
- Florida Fruit & Vegetable Association
- National Aggregates Association
- National Agricultural Aviation Association
- National Food Processors Association
- National Propane Gas Association
- National Ready-Mixed Concrete Association
- National Utility Contractors Association
- New England Fuel Institute
- United States Telephone Association

II. BACKGROUND

3. In this proceeding, the Commission proposes to permit applicants for conventional Specialized Mobile Radio ("SMR")

systems on General Category frequencies to obtain service from any of the three recognized frequency coordinators for 800 MHz, the Industrial Telecommunications Association, Inc. ("ITA"),² the National Association of Business and Educational Radio, Inc. ("NABER"), and the Associated Public-Safety Communications Officers ("APCO"). The Commission's proposal results from a Petition for Rule Making filed by ITA on February 4, 1992.

4. The Notice of Proposed Rule Making points out that when SMR licensees wish to combine conventional SMR systems into a trunked system, they may obtain frequency coordination from any of the three certified 800 MHz coordinators. However, an applicant for a conventional SMR system does not enjoy similar latitude; the applicant must obtain frequency coordination from NABER. The Notice of Proposed Rule Making concludes that there is no benefit to be gained by separate treatment of applicants based on the type of system proposed.

III. COMMENTS

5. The Commission's Notice of Proposed Rule Making observes that "NABER, APCO and SIRSA all currently maintain complete up-to-

² Subsequent to the Commission's release of its Notice of Proposed Rule Making in this proceeding, the Special Industrial Radio Service Association, Inc. ("SIRSA") changed its name to the Industrial Telecommunications Association, Inc.

date data bases for General Category channels." This observation represents, in ITA's view, perhaps the most compelling justification for implementing the proposed change. Though the Commission must seek to ensure that applicants receive quality coordination service, there is no need to restrict applicants to one coordinator in order to accomplish this result.

6. If all three certified 800 MHz coordinators are permitted to coordinate applications for conventional SMR stations, there will be greater incentive for the individual coordinators to ensure that applicants receive a superior product. Relying on the well-established reliability of its data base and the demonstrated technical competence of its coordination staff, ITA is able to provide a quality service to applicants on an expeditious basis. However, until the Commission implements the change proposed in this proceeding, applicants proposing to use the General Category channels for conventional SMR stations are unable to avail themselves of ITA's services. ITA believes that the Commission must allow such applicants to choose for themselves which coordination service will best meet their needs.

7. The opportunity to select among three different coordinators will have another salutary effect. As ITA noted in its Petition for Rule Making, and as the Commission reiterated in the Notice of Proposed Rule Making, the current situation has the

potential to impose a handicap on applicants for conventional SMR stations. Often, these applicants find that they are competing for the same channels with applicants who desire to use the General Category frequencies to expand or consolidate a trunked SMR system.

8. Whereas the applicants seeking to expand or consolidate a trunked system are free to select any one of the three certified 800 MHz coordinators, applicants for a conventional SMR are restricted to using a single coordinator. The former class of applicants enjoy the latitude to select the coordination service, and the level of service, that best satisfy their requirements; the latter class of applicants do not have similar latitude. In some cases, this discrepancy in the coordination requirements could frustrate the effort by applicants for conventional SMR stations to obtain channels in congested areas.

9. Applicants for conventional SMR systems should be able to select the particular frequency coordinator best poised to provide a quality service on a timely basis. The Commission's proposal in this proceeding, if implemented, would permit applicants for conventional SMR systems to exercise their discretion in selecting a coordinator. ITA strongly supports the Commission's proposal in this proceeding and urges the Commission to proceed expeditiously to implement the proposed change to Section 90.615.

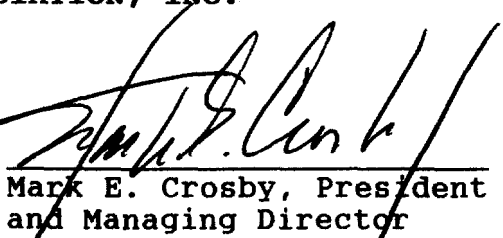
IV. CONCLUSION

10. ITA strongly supports the Commission's proposal. Adoption of the proposed rule change would allow all applicants for conventional SMR systems to exercise their own discretion in the selection of frequency coordinators. ITA urges the Commission to move expeditiously to adopt its proposal in this proceeding.

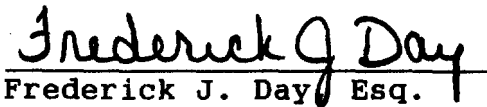
WHEREFORE, THE PREMISES CONSIDERED, the Industrial Telecommunications Association, Inc. respectfully submits these Comments and urges the Federal Communications Commission to act in accordance with the views expressed herein.

INDUSTRIAL TELECOMMUNICATIONS
ASSOCIATION, INC.

By:


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By:


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Dated: November 27, 1992